

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

)	
In the Matter of)	CONSOLIDATED
)	Docket No. 16-CRB-0009-CD
Distribution of the 2014 - 2017)	(2014-17)
Cable Royalty Funds)	
)	

**COMMENTS OF THE
COMMERCIAL TELEVISION CLAIMANTS
ON CONTROVERSIES REGARDING DISTRIBUTION OF 2014 - 2017 CABLE FUNDS**

The Commercial Television Claimants Group (“CTV”), represented by the National Association of Broadcasters (“NAB”), files these comments in the above-referenced proceeding in response to the Notice issued by the Copyright Royalty Judges, 83 Fed. Reg. 56106 (Nov. 9, 2018). The Notice requests comments on the existence and extent of any controversies regarding the distribution of 2014 – 2017 cable funds.

A. Existence of Allocation Phase Controversies

With respect to the 2014, 2015, 2016, and 2017 cable funds, allocation controversies exist at the present time among CTV, Program Suppliers, Joint Sports Claimants, Public Television Claimants, Music Claimants, Canadian Claimants, Devotional Claimants, and National Public Radio.

B. Existence of Distribution Phase Controversies

With respect to the 2014, 2015, 2016, and 2017 cable funds, CTV is aware of the existence of distribution controversies between commercial television station claimants represented by NAB and other claimants as to the Program Suppliers, Public Television, Devotional, and Music royalties.

CTV reserves its right to identify additional controversies in response to the acquisition of additional information, or the filings of additional parties.

Respectfully submitted,

COMMERCIAL TELEVISION CLAIMANTS

**NATIONAL ASSOCIATION OF
BROADCASTERS**

/s Ann Mace

John I. Stewart, Jr. (D.C. Bar No. 913905)

David Ervin (DC Bar No. 445013)

Ann Mace (D.C. Bar No. 980845)

CROWELL & MORING LLP

1001 Pennsylvania Ave., N.W.

Washington, D.C. 20004-2595

Telephone: (202) 624-2685

Fax: (202) 628-5116

jstewart@crowell.com

dervin@crowell.com

amace@crowell.com

Its Counsel

December 10, 2018